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Attorneys for Defendant Kelly Keays

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

CONOCOPHILLIPS ALASKA, INC.

Plaintiff,

vs.

FORREST WRIGHT; AMANDA
WRIGHT; NATHAN KEAYS; KELLY
KEAYS; ECO EDGE ARMORING, LLC;
DAVID BENEFIELD; WRIGHT
CAPITAL INVESTMENTS, LLC; and
DB OILFIELD SUPPORT SERVICES,

Case No.: 3:19-cv-00311-SLG

Defendants.

**DEFENDANT KELLY KEAYS' RESPONSE TO PLAINTIFF'S
MOTION FOR PRELIMINARY INJUNCTION**

Defendant Kelly Keays, through counsel Ashburn & Mason PC, hereby responds to ConocoPhillips Alaska Inc.'s ("ConocoPhillips") Motion for Preliminary Injunction, in which ConocoPhillips seeks to prevent all named defendants, including Ms. Keays, from transferring funds and dissipating assets during the pendency of the civil action.

I. Background

On December 13, 2019, this Court granted ConocoPhillips' Ex-Parte Motion for Temporary Restraining Order ("TRO"), and ordered Defendants not to "sell, transfer, or dispose of any assets received from ConocoPhillips or any assets--including any real property, any personal tangible property, and any intangible property--purchased, partially purchased, paid for, or maintained with any assets or money received from or paid to them by ConocoPhillips."¹ The court also ordered accounts "owned or controlled by" Defendants, including Ms. Keays, to be frozen.²

The order covered accounts affiliated with two specific institutions, as well as "all other financial institutions where Defendants have accounts."³ Ms. Keays has no ownership interest in Eco Edge Armoring, LLC or DB Oilfield Services, LLC, nor does she have access to either entity's accounts. However, the court's order effectuated the freezing of Ms. Keays' principal Wells Fargo checking account. As such, she has had no access to her regular source of income since shortly after the entry of the order.⁴

The TRO expires on December 26, 2019. On that date, the Court will determine whether the terms of the TRO continue in force as a Preliminary Injunction.

¹ Docket 9 at 9.

² Doc. 9 at 8.

³ Doc. 9 at 8.

⁴ Ms. Keays is a nurse at Providence Hospital. Her paychecks are direct deposited in the WF "Complete Advantage" checking account on a bi-monthly basis. The checks typically range from \$2,200-\$2,800 dollars per deposit.

II. Ms. Keays' position related to the Preliminary Injunction

Ms. Keays does not object to the Court granting the preliminary injunction, subject to the terms of a stipulation reached between ConocoPhillips and Ms. Keays, and filed concurrently with this response.⁵ In light of the foregoing, Ms. Keays respectfully requests any order granting the preliminary injunction include the terms and conditions established in the parties' joint stipulation.

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DATED: 12/19/19

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⁵ Stipulation of ConocoPhillips and Kelly Keays, dated December 19, 2019.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 19, 2019, a copy of the foregoing was served electronically through the CM/ECF system on the following:

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